



**Jack Zinman**  
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August 10, 2005

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW – Lobby Level  
Washington, D.C. 20554

Re: **Subscriber Notification Report** -- E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On behalf of SBC Communications Inc. (SBC), I am submitting the attached report regarding SBC's compliance with the Commission's 911 subscriber notification requirements for VoIP services. If you have any questions or need additional information, please do not hesitate to contact me.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ *Jack Zinman*

Attachment

cc: Byron McCoy  
Kathy Berthot  
Janice Myles

SBC Communications, Inc.  
**Subscriber Notification Report**  
WC Docket No. 05-196

In response to the information requested in the Enforcement Bureau's *VoIP 911 Public Notice*,<sup>1</sup> SBC Communications, Inc (SBC) submits the following report detailing its compliance with the Commission's VoIP 911 subscriber notification requirements.

1. A detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (*i.e.*, e-mail, U. S. mail).

**SBC currently provides a VoIP service, known as PremierSERV Hosted IP Communications Service (HIPCS), to business customers.<sup>2</sup> On July 22, 2005, SBC sent via certified U.S. mail the following VoIP 911 Notice in the text of a letter to each existing HIPCS subscriber:<sup>3</sup>**

**Thank you for choosing the SBC family of companies as your communications provider and for your confidence in SBC PremierSERV<sup>SM</sup> Hosted IP Communication Service (HIPCS). The purpose of this Notice is to describe circumstances under which 911 service may be unavailable with HIPCS or how it may be limited in comparison to 911 service available from traditional local access lines (see below). This Notice, and the requirement for an Acknowledgement, is required by the Federal Communications Commission (FCC).**

**FCC regulations require that each HIPCS station display a visible warning regarding 911 service. To that end, we have included with this Notice a supply of tent cards for each of your HIPCS stations. Please place a tent card near each HIPCS terminal currently installed. We will provide a tent card for any HIPCS station installed subsequent to this Notice. Please let us know if you need additional cards.**

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<sup>1</sup> *Enforcement Bureau Provides Guidance to Interconnected Voice Over Internet Protocol Service Providers Concerning the July 29, 2005 Subscriber Notification Deadlines*, WC Docket No. 05-196, Public Notice, DA 05-2085 (released July 26, 2005) (*VoIP 911 Public Notice*).

<sup>2</sup> The entity actually providing HIPCS to subscribers is an SBC affiliate known as SBC Internet Services, Inc. For simplicity, however, we refer to HIPCS as being provided by SBC in this report.

<sup>3</sup> Due to a clerical error, the letter was not sent to one HIPCS subscriber until August 8, 2005. This particular HIPCS subscriber has since submitted an affirmative acknowledgement that it received and understood the VoIP 911 notice from SBC.

FCC regulations require an Acknowledgement that the HIPCS subscriber understands the 911 limitations of the service. Please acknowledge receipt of this Notice by signing the Acknowledgement at the end of this Notice, and returning the entire Notice to us in the enclosed envelope by July 29, 2005.

911 services are available for HIPCS users subject to the following limitations:

- HIPCS terminals (handsets and speakerphones) will not work during a broadband service outage, or where there is a loss of power. Consequently, a station user cannot dial 911 from an HIPCS terminal during such outages.
- 911 emergency response services may not be able to automatically identify the number or street address from which you are calling if the Registered Service Address for the telephone is not current. Under the terms of the contract, you are responsible for providing SBCIS with the Registered Service Address of each station, and to keep that information current.
- If you are calling 911 from a HIPCS terminal, and you are not at the Registered Service Address for that HIPCS terminal, emergency response service may not be able to identify your current location and may not be able to dispatch emergency response service.
- Do not use the Click-to-Call feature to place 911 calls.
- Do not use a Virtual Private Network (VPN) connection or other remote access service to place 911 calls.

Please sign the Acknowledgement at the end of this Notice, and return the entire Notice by July 29, 2005 to the following address (or use the pre-addressed envelope provided):

SBC  
Mary Ann Gillespie  
200 W SBC Center Drive, Room # 3E01D  
Hoffman Estates, IL 60196

We do appreciate your business and look forward to the continued opportunity of serving you. Thank you for being an SBC customer. If you need more information about this mailing or its content, please feel free to contact a member of your account team.

Mary Ann Gillespie  
Associate Director-Product Management

#### **ACKNOWLEDGEMENT**

This is to acknowledge and confirm that I have received and understand the 911 Notice provided above, and that a warning card describing the 911 call limitations

of the HIPCS Service has been placed on or near each HIPCS terminal to inform users of the 911 calling limitations of the HIPCS service.

Signature of Authorized Representative: \_\_\_\_\_

Title of Authorized Representative: \_\_\_\_\_

Date: \_\_\_\_\_

Company Name: \_\_\_\_\_

Company Street Address: \_\_\_\_\_

**Please retain a copy for your records.**

**In addition to sending each HIPCS subscriber the preceding Notice, SBC account representatives contacted individual subscribers via telephone calls and e-mails, as necessary, to ensure that each subscriber received and understood the VoIP 911 Notice from SBC and to verify that subscribers understood the need to return the Acknowledgement Form to SBC.**

2. A quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005.

**As of August 10, 2005, SBC received an affirmative acknowledgement that the HIPCS subscriber received and understood the VoIP 911 Notice from 94.1% of SBC's existing HIPCS subscribers. SBC has some indication that one customer may choose not to return the Acknowledgement Form by August 29, 2005. The customer has acknowledged its receipt of the above-referenced Notice.**

3. A detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (*i.e.*, e-mail, U. S. mail).

**As indicated in response to question 1 above, on July 22, 2005 SBC mailed a comprehensive Notice to each HIPCS subscriber with an ample supply of tent cards containing the text listed below. The Notice instructed the subscriber to place the tent cards near each of the subscriber's HIPCS stations. The Notice also asked the subscribers to notify SBC if they needed additional cards, which we will provide upon request.**

[Text of tent card]

**911 EMERGENCY CALLING LIMITATIONS  
FROM THIS INTERNET PROTOCOL (IP)-BASED TELEPHONE**

- **HIPCS terminals (handsets and speakerphones) will not work during a broadband service outage, or where there is a loss of power. Consequently, a station user cannot dial 911 from an HIPCS terminal during such outages.**
- **911 emergency response services may not be able to automatically identify the number or street address from which you are calling if the Registered Service Address for the telephone is not current. Under the terms of the contract, you are responsible for providing SBCIS with the Registered Service Address of each station, and to keep that information current.**
- **If you are calling 911 from a HIPCS terminal, and you are not at the Registered Service Address for that HIPCS terminal, emergency response service may not be able to identify your current location and may not be able to dispatch emergency response service.**
- **Do not use the Click-to-Call feature to place 911 calls.**
- **Do not use a Virtual Private Network (VPN) connection or other remote access service to place 911 calls.**

4. A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in the first bullet above and/or to whom the provider did not send warning stickers or other appropriate label as identified in the bullet immediately above.

**SBC sent the VoIP 911 Notice described in item 1 above to all HIPCS installed subscribers. Zero percent of SBC's subscribers did not receive the notice.**

5. A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with the Company no later than August 30, 2005;

**SBC account representatives will continue to contact those HIPCS subscribers who have not returned the Acknowledgement Form described above. These contacts will occur over the next couple of weeks via telephone calls and e-mails. As necessary, these contacts will be made at progressively higher levels of the subscriber's management. In the event that a HIPCS subscriber declines to affirmatively acknowledge that it understands the VoIP 911 Notice, SBC will advise the subscriber of the potential for disconnection of the HIPCS service. SBC is**

**prepared to disconnect the subscriber's VoIP service on August 30, 2005, if an affirmative acknowledgement has not been received by August 29, 2005.**

6. A detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers.

**Upon receiving an Acknowledgement Form , SBC date-stamps the Form and stores it in a file with Acknowledgement Forms from other HIPCS subscribers. SBC also electronically updates its HIPCS account databases to reflect receipt of the Acknowledgement Forms.**

7. The name, title, address, phone number, and e-mail address of the person(s) responsible for the Company's compliance efforts with the *VoIP E911 Order*.

**SBC has devoted numerous operational, sales, regulatory and legal personnel to ensuring compliance with the Commission's VoIP 911 Order. The primary point of contact for SBC's efforts to obtain affirmative acknowledgements from HIPCS customers is:**

**Mary Ann Gillespie  
Associate Director  
2000 W SBC Center Drive  
Room 3E01D  
Hoffman Estates, IL 60196  
(847)248-2925  
[mary.a.tarchinski@sbc.com](mailto:mary.a.tarchinski@sbc.com)**